OIL POLLUTION REPONSE POLICY

Ref: (a) Town of Nantucket Waterways Bylaw, Chapter 137

- (b) Town of Nantucket Coastal Oil Spill Plan
- (c) Massachusetts Geographic Response Plan Tactics Guide (http://grp.nukaresearch.com/CIGRP.htm)

In accordance with reference (a), the Nantucket MCRD is responsible for responding to all pollution incidents occurring on Nantucket Island and surrounding waters. As a first response agency, we must be prepared and equipped to immediately notify federal, state and local pollution response agencies and deploy available resources to recover, contain, or divert oil spills in an effort to protect Nantucket's waterways natural resources.

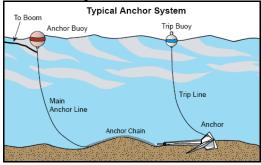
For all major spills, the most important initial action is the proper notification of federal, state and local response organizations that have the expertise and resources to effectively respond to an oil spill incident. In general a major spill is one that is 10 gallons or more and cannot be properly cleaned up or contained with Department resources, has the potential to spread rapidly, and has the potential to endanger people and/or the environment. **Enclosure (1), Notifications - Oil Spill Response Organizations** shall be used to ensure proper notifications are made.

Personal safety must always be a primary consideration in all pollution response cases. The proper wearing of Personal Protective Equipment (PPE) during all clean up operations is mandatory, such as eye protection, coveralls, breathing mask/respirator, gloves, etc. If at any time you are uncertain of the product or material that has been spilled, consult the Material Safety Data Sheet (MSDS) if available, or wait until someone with knowledge of the material arrives on scene.

The MCRD maintains a Pollution Response Trailer, located at the Town Building at 2 Fairgrounds Road (2FG). There is an additional Pollution Response Trailer; a Hazardous Materials Trailer and some smaller pollution response trailers located at 2FG as well. These trailers contain: Oil Containment Hard Boom, various sizes and lengths of Absorbent Booms, Absorbent Sweeps and Pads, Oil Snare, Enviro-Bond 403, and mooring anchors. The shed on the dock at Town Pier, the Boat House and the garage at Washington Street Extension House also have additional anchors and absorbent pads, boom and bilge socks. The primary source of equipment, however, will come from the trailers at 2FG. They contain a significantly larger pollution response equipment inventory and capability. In addition, for large scale pollution incidents, the Nantucket Police Department maintains a mobile communication vehicle which be utilized for a unified command response.

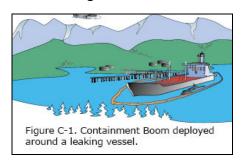
Securing the pollution source must be the primary consideration of the Responsible Party (RP). As part of our initial action, we may be asked to transport a representative of the RP to the scene to secure the source of the spill, such as plugging vents, securing valves, transferring product, etc. We will be committed to assisting the RP in initial containment and recovery actions; however, at no time shall MCRD Department personnel enter the polluted water or attempt to board a sinking or damaged boat in an attempt to secure the source of the spill. While the MCRD is not equipped nor manned to respond to a large scale pollution incident, we are capable of providing critical first response actions that can prevent or reduce the amount of damage a spill may have on the environment. The following Booming and Recovery procedures in accordance with reference (c) shall be followed during all oil pollution response efforts:

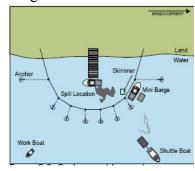
Boom is a containment barrier used to intercept, control, contain, and concentrate spreading oil on water. Boom is secured in place using standard anchoring systems; the scope of the anchor line should be at least 3 times the depth of water, more if necessary. Anchor trip lines should be used to reposition the anchors.



There are three primary types of Booming Tactics that we should be prepared to execute: Containment Boom, Diversion Boom, and Exclusion Boom:

<u>Containment Boom</u> – The objective is to corral spilled oil on the water, usually near the source, thus minimizing spreading and impacts to the environment. Boom can be anchored in place around an anchored or grounded vessel, can be placed shoreline to shoreline around a leaking vessel tied to a dock or around a spot where oil is running off the land into the water. For leaking vessels that are out in the harbor or offshore, the vessel needs to be anchored fore and aft before deploying the containment boom; estimate the boom length at 3 times the vessel's length.





<u>Diversion Boom</u> – The objective of the Diversion Boom tactic is to redirect the spilled oil from one location or direction of travel to a specific site for recovery. The tactic is for water-born spills where the **movement of the current** carries the oil along the boom to a recovery location. Oil can be diverted to a shoreline or away from a shoreline or shoal waters.

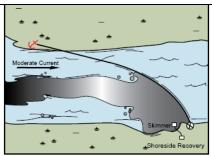


Figure DV-4. Single boom diversion configuration.

<u>Exclusion Boom</u> – The objective of the Exclusion booming strategy is to prohibit oil slicks from entering a sensitive area. Exclusion Booming is not recommended for open water or fast water environments.

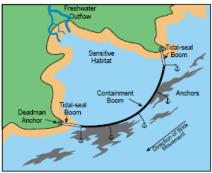


Figure EX-2. Exclusion booming configuration.

Recovery Tactics – For large scale oil spill incidents, recovery of oil contained or concentrated with boom or natural barriers is accomplished using a skimming system that removes oil from the surface and transfers it to a secondary containment for disposal. The MCRD personnel (Harbor Master and 02 Assistant Harbor Masters) are trained to operate and maintain a small skimming system in conjunction with Harbor Fuel Oil Corporation personnel. The Assistant Harbormaster has been formally trained by the Coast Guard Research and Development Center on operating skimming systems for vessels up to 55°. While the MCRD does not maintain or operate a large skimming system, there are state and federal agencies with this expertise and capability that will be utilized in a unified command response.

MCRD personnel will also be expected to employ the Passive Recovery tactic:

a <u>Passive Recovery</u> – Passive Recovery is performed through the process of absorption on sorbent materials, such as sorbent pads, rolls, and booms, oil snare, and natural products. Sorbent materials are made from substances like polypropylene, a synthetic material that is oleophilic (oil-attracting) and hydrophobic (water-repelling). When left in an oily water mixture, they can collect many times their own weight in oil while collecting very little water. The tactic is usually deployed by anchoring rows of sorbent boom or oil snare along the shoreline or in the intertidal zone.

General procedures for deployment of Passive Recovery system:

- Identify the trajectory of the spilled oil and select areas to be protected. Identify natural collection sites where floating debris is usually found.
- Secure sorbents with anchors or stakes (on-land).
- Monitor the sorbent on a regular basis for oil content and security of the anchor system.
- Replace saturated sorbents as necessary.
- Store and dispose all recovered sorbents according to the Waste Management Plan.
- 6. Response Strategy As outlined in reference (c), the Geographic Response Plan provides unified priorities and response strategies for the protection of selected sensitive areas to aid first responders to an oil spill. **Enclosure (2), Nantucket Geographic Response Plan** identifies sensitive areas and resources within Nantucket's area of responsibility, and outlines response strategies, equipment needs and logistical information necessary to protect them from marine oil spill impacts. As first responders, the Nantucket MCRD, and the Nantucket Fire Department will be relied upon to implement the response plan in the event of a major oil spill.

Enclosures: (1) Notifications - Oil Spill Response Organizations

(2) Nantucket Harbor and surrounding waters Geographic Response Plan

NOTIFCATION Oil Spill Response Organizations

In the case of a Fire, Explosion, Serious Personal Injury, or Life Threatening Situation call 911.

Organization	Type	Phone Number
USCG Sector Southeastern New England	Federal	(866) 819-9128
USCG Station Brant Point	Federal	(508) 228-0398
MA DEP Southeast Regional Office	State	(508) 946-2700
Nantucket Sound Keeper	State	(508) 775-9767
Nantucket Fire Department	Local	(508) 228-2324
Nantucket Police Department	Local	(508) 228-1212
Harbor Fuel Cooperation	Local	(508) 228-2411